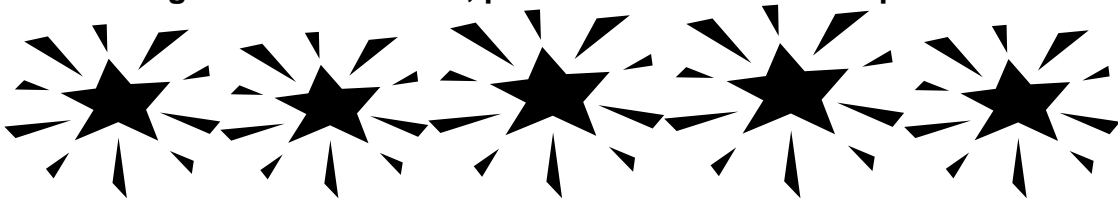# What is Community Based Instruction?

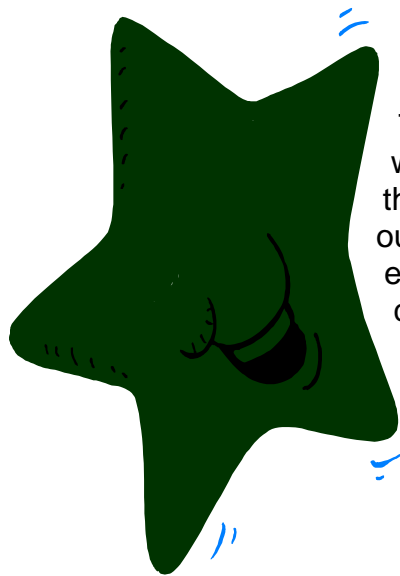**A guide for educators, parents and adult service providers**

**Why is Community-Based
Instruction Important?**

**What does quality instruction
in the community look like?**
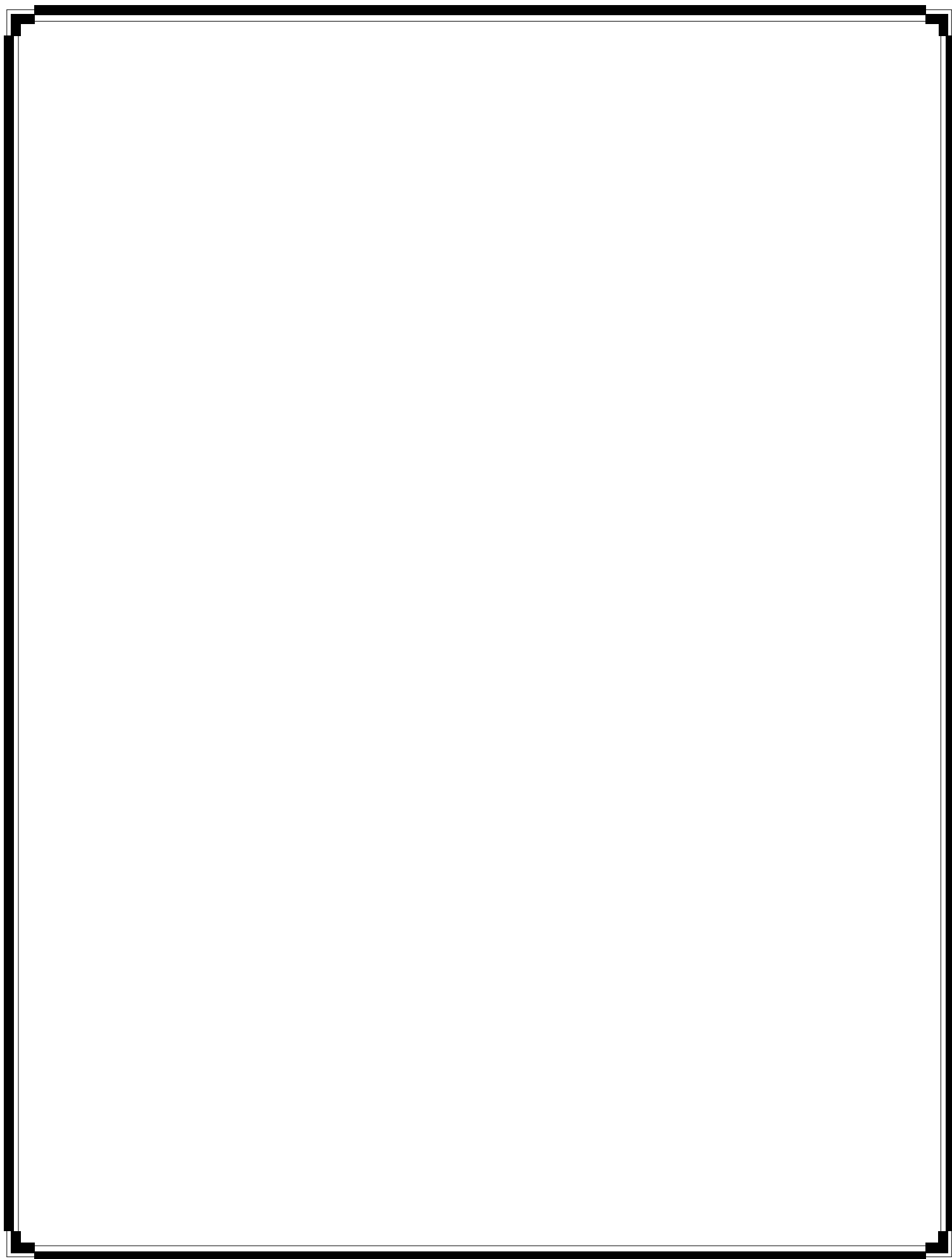
Transition Tacklebox

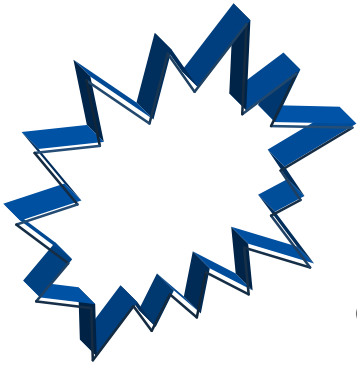**South Dakota Transition to Adulthood Systems Change Project
2000**

Traditionally, classrooms have been surrounded by four walls tucked safely within a school building. Unfortunately that is not the most effective method of delivering adult-outcome based instruction to students with disabilities. If we expect students to live, learn, work, and play in their community after graduation, we must train them prior to graduation in environments in which these skills will later be used. Everyone involved in community-based training must first realize that a special education teacher's classroom is now the **whole community**.

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Community Based Instruction

I. Introduction

A. Why is Community Based Instruction important?

1.) Real Life Experiences.

To be truly prepared to live and work in their communities after graduation, students with disabilities are going to need to practice independent living and employment skills in the settings in which they will be used while still under the supervision of educators.

2.) Variety of skills.

Community-based training is a reality based training program conducted in the community, with the ultimate outcome being competitive employment and independent living. Community-based training should be offered in several skill areas: vocational, community service utilization, activities of daily living, residential, and recreation, in order to meet a wide variety of student needs. Some students may need community-based training in all areas, whereas other students may have a need for training in only one or two areas.

3.) Transferable Skills.

In a community-based approach, students may initially learn and practice a skill (e.g., buying food) in the classroom but eventually practice the skill in a community or home setting. This is because many students will have difficulty transferring what they have learned in the classroom to the actual setting in which the skill is typically used (e.g., the grocery store). While the student can perform the skill in class, he or she may not be able to do so in the real world environment where the skill is actually needed. Therefore, "community environments frequented by the student and/or his or her

family now and in the future should be the environments used to directly teach" (Falvey, 1989b,p.92).
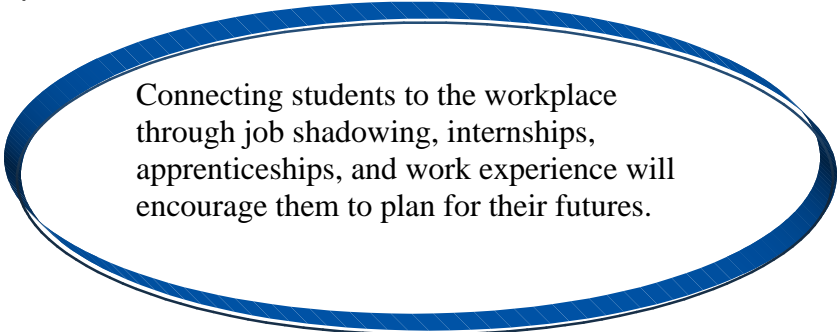
4.) Responsibilities.

For a number of logistical reasons, many school districts have been reluctant to use a community-based approach. The most typical problems include difficulty in staffing, funding, transportation, liability issues (who is responsible for injury or property damage when students are involved in community training), safety of the students, community access, and administrative, teacher, and parental support (Falvey, 1989b,pp.94-105). Yet, there are many ways in which school districts can address and overcome these problems (see Falvey, 1989b). Now that "community experiences" are listed in IDEA's definition of transition services [§ 300.18(b)(2)(ii)], one would expect to see school districts providing some transition services through a community-based curriculum. It is certainly worthwhile for districts to develop instructional programs based in the community and for parents and student to support this type of learning experience. Such an approach to learning and teaching is often essential, if students are going to master the skills necessary to function in the community. (NICHCY, 1993).

5.)   How we Learn.

10% of what we see;
20% of what we hear;
50% of what we see and hear;
70% of what is discussed by others;
80% of what we experience personally and
95% of what we teach someone else.

This once again, emphasizes the importance of a strong community-based instructional component as part of the transition services provided to students with disabilities.

Connecting students to the workplace through job shadowing, internships, apprenticeships, and work experience will encourage them to plan for their futures.

II.   What is Community Based Instruction?

The type of community-based training most often used across all disability categories is in the area of vocational training. Community-based vocational training can take many forms. Following are descriptions and scenario of the most common components of community-based training/vocational training found in school programs.

Susie is 15 years old and is a sophmore in high school at Town School District. She has a severe learning disability and needs assistance in determining her future. When meeting with her local Vocational Rehabilitation Counselor, Ted and her Special Education Teacher, Mrs. W, they all decided to complete a timeline together.

The following is an example of a timeline which includes most of the components of community based training:

TRANSITION TIMELINE
for Student

Age 15 – sophmore

Job Shadowing

Susie will be exposed for short periods of time to a variety of work settings to help her make decisions about future career directions. She will gain information by observing other people work and talking with the employees.

Age 16 – junior

Project Skills/Work Experience

Various employment opportunities will be developed for Suzie to gain work experiences in different settings. The training will be included in Susie's Individualized Education Program and closely supervised by school staff. The

purpose of vocational training is to enable her to develop competencies and behaviors needed to secure future paid employment. As Susie reaches training goals in one setting she will be moved to another where additional training or reinforcement of skills can occur.

(Project Skills is a work experience program that is an agreement between vocational rehabilitation and the school districts. Students are paid for work performed through vocational rehabilitation. The school districts match the funds by providing job coaching, job development, and follow-along services.)

Situational Assessment

This vocational assessment component will allow school staff to work with and observe Susie in different work settings in order to determine appropriate training objectives and environments. She will rotate through various work settings that correspond to her employment interests.

III. What does quality instruction in the community look like?

- ✓ Students should have frequent opportunities to interact with persons without disabilities.

- ✓ Involve students in a wide range of occupational areas so that they can make career choices.

- ✓ Make sure students have access to rehabilitation engineering and assistive technology.

- ✓ Reflect the local labor market needs.

- ✓ Include employment areas that have the potential of providing future meaningful work for decent pay.

- ✓ Keep parents informed and involved in the planning of community-based training for their child.

✓ Keep the instruction part of a long-range career plan.

✓ Keep the community-based instruction ongoing throughout secondary transition services.

✓ Indicate the community-based instruction in the transition component of the IEP.

✓ Keep the school personnel actively involved in the supervision of community-based training.

✓ Keep up with the performance evaluations.

✓ Make the instruction a natural experience.

✓ Openly discuss the community-based training activities with the students and their families.

Quality Community-Based Instruction

When implementing a community-based training program, there are several areas in which planning must occur and procedures that must be established. These areas include:

- ❑ funding,
- ❑ staffing,
- ❑ liability,
- ❑ integration,
- ❑ instructional strategies and
- ❑ data collection.

A. Funding

Adequate fiscal support is vital to the success of any educational program and must be obtained from a secure source if a program is to be sustained over a long period of time. When providing instruction within a classroom, there are many material/equipment needs, including books, etc.

When providing community-based training, the supply needs are different but not more expensive. In fact, training skills in the community will usually be less expensive than teaching adult life skills on-campus in a simulated environment.

For example, training in residential skills can be provided in a "model apartment" at a local apartment complex, where furniture and appliances are already located. If this training were provided on a school campus, an apartment would have to be created and this could be quite costly.

- Redirect monies traditionally used for classroom supplies to provide for community-based training needs.

- Contributions.

- Fund-raising projects.

- Families of the students make grocery/supply lists and send these lists with the money.

- Lunch money.

- Set up a shopping or errand service for school staff and for other departments within the school (e.g. Home Economics) (Falvey, 1989).

- Profits from a small business.

- Arrange with local stores to conduct "mock" shopping trips. This involves students shopping from a "mock" shopping list and carrying out all the steps associated with purchasing items but not actually "buying" the items. This type of activity is good to use for high priced items such as clothes, appliances, and furniture.

- There are many activities in the area of community-based training that do not require funds except those that may be needed for transportation. Visiting a doctor's office (to learn the skills associated with a doctor's appointment), visiting the health department (to learn about accessing services), going to the public library (to learn how to get a card and check out books), going to a lawyer's office (to learn the skills associated with obtaining legal services) and many other community service utilization training activities can be done at virtually no cost.

B. Staffing

Community-based training requires schools to reevaluate the traditional methods of utilizing staff and staffing schedules. Staffing patterns for conducting

community-based training activities will differ from those typically used for classroom instruction. While large numbers of students with few staff, may be appropriate for some types of exploratory field trips (e.g. industry tours), this type of staffing pattern is totally inappropriate for community-based training. In order for instruction to occur, there should be sufficient staff:student ratios to actually teach skills while in the community.

In determining possible solutions to staffing problems that may occur with community-based training, several things must be considered including;

1) individual student needs;

2) the types of community-based training sites that will be offered;

3) staff available for the program; and

4) possible sources of additional staff. Following are some suggestions for staffing a community-based training program.

C. Staffing Strategies

Team Teaching. Team teaching involves two (or possibly more) teachers working together to implement a community-based training program. While one teacher is scheduled for community-based training activities, the other teacher assumes responsibility for students not participating in community-based training that day

Use of support personnel. Related services staff such as speech therapists, occupational therapists, physical therapists, or assistants in these areas can be used to assist with community-based instruction. Since the goal of all instruction for students with disabilities is generalization to the real world, where better to work on communication and mobility skills than in the community where these skills will ultimately be used?

- **Use of volunteers.** Many schools already have a volunteer program in place. Volunteers can be used to assist in community-based training but should be provided with systematic inservice training and in most cases should be accompanied by a member of the school staff.

- **College students**. The use of college interns to conduct community-based training is similar to using volunteers. The advantage of using student interns is that they may already be familiar with instructional strategies and the field of special education in general.

- **Computer-assisted instruction.** Since community-based training requires some staff to be off campus, there must be some method of adequately providing instruction to those students who remain in class. Computer-assisted instruction can assist with practice drills and review-type activities, thereby allowing less staff to accomplish the same amount of instruction.

- **Use of the same setting for multiple skill training.**
  There are some community training sites that lend themselves to teaching more than one skill. Usually these sites are vocational in nature. The idea behind this strategy is that less staff can supervise more students if the students are spread out (each working on a different skill in different stages of skill acquisition) over a single setting. For example, in a local Wal-Mart students can receive vocational training in the snack bar, customer service, the photography studio, the stockroom, custodial services, and the lawn center, while one or two staff move about assisting store employees in the supervision of the students.

- **Heterogeneous Grouping.** This strategy involves grouping students who have different training needs regarding intensity, duration, content or type of direct instruction. By grouping students of varying ability, they can benefit from observational learning and social interactions. In some cases, peer tutoring can be used.

D. Liability

One of the first concerns usually voiced by all parties (e.g. school administrators, parents, employers, school staff) when community-based training is mentioned is potential liability. Actually, what people are really concerned about is student safety. Traditionally, classrooms have been surrounded by four walls tucked safely within a school building. Unfortunately that is not the most effective method of delivering adult-outcome based instruction to students with disabilities. If we expect students to live, learn, work, and play in their community after graduation, we must train them prior to graduation in environments in which these skills will later be used. Everyone involved in community-based training must first realize that a special education teacher's classroom is now the **whole community**. Once community-based training is recognized as a legitimate teaching strategy, then real progress can be made in overcoming barriers, such as concerns about liability.

The most important liability-related issue is negligence. Negligence is most often associated with an absence of reasonable policies, procedures, actions, supervision, and behaviors that result in injury. There are many ways to ensure the safety of students while simultaneously protecting school staff from liability.

Liability Strategies

Parent permission.
Secure written parent permission for all community-based training activities.

IEP.
Ensure that the goals and objectives concerning community-based training are clearly indicated on the transition component of the student's Individualized Education Program.

Adopt Community-Based Training.
Have the local school board formally adopt community-based training as an approved teaching strategy and ensure staff involved in this activity are covered under the school system's liability policy (Falvey, 1989).

First Aid Kits.
Ensure that all staff accompanying students to community-based training sites have been trained in CPR and first aid. Have first aid kits readily available in all vehicles used for community-based training (Hamre-Nietupski, Dander, Houselog, and Anderson, 1988).

Medical Release.
Have medical release permissions signed by parents. These forms should give permission for school staff to obtain medical attention for students in the case of an accident and when parents cannot be reached. These forms should contain pertinent information concerning emergency contacts, the name of the student's physician, insurance information, allergies, and other relevant medical information.

Injured on Site.
Have a written procedure to follow if a student is injured at a community-based training site. Make sure all staff receives training in this procedure.

Adequate Insurance.
Ensure that students have adequate insurance to cover them in the event of an accident at a community-based training site. Some systems simply require proof that a student has insurance coverage (i.e. private or Medicaid). Other systems require that students take out additional coverage through the school's insurance program. If additional insurance is required there must be measures in place to assist with the cost for those students who are financially unable to afford school insurance. The purchase of school insurance will help defray any costs incurred by parents due to a deductible and/or co-payments in the event of an accident.

Safety.

Prior to utilizing a community-based site, teachers should do a safety assessment and discuss potential hazards with the contact person at the site.
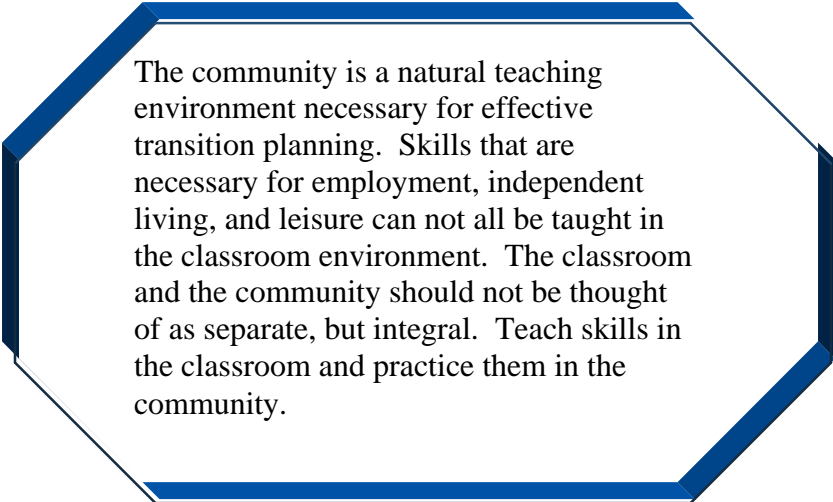
Local Law Enforcement.

Notify local law enforcement agencies and rescue squads of the community-based training activities being conducted by the school system so they will understand why students are in the community during the school day and will be ready to assist in the case of an accident (Falvey, 1989).

Safety Awareness Training.

All students should receive safety awareness training. This training should provide general safety training, as well as training specific to sites that may present unusual situations. If a site requires the use of machinery, it is a good idea to use a safety skill checklist and require students to pass a test prior to being allowed to use the machinery. If possible, students should go through the same safety training as employees at the business site. Remember that the Occupational Safety and Health Act (OSHA) regulations that apply to the worksite also apply to the students even though they are not in an employment relationship.

Child Labor Laws.

All applicable child labor laws should be enforced during vocational training at business sites.

The community is a natural teaching environment necessary for effective transition planning. Skills that are necessary for employment, independent living, and leisure can not all be taught in the classroom environment. The classroom and the community should not be thought of as separate, but integral. Teach skills in the classroom and practice them in the community.
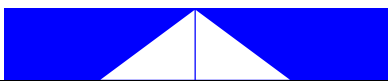
Sample Transition Goals and Short Term Objectives

Community-Based Instruction is a meshing and overlapping of numerous skills. The following objectives will give an example of how to implement an activity one uses in everyday life. Community-Based Instruction needs to be functional and completed in a natural setting.

For example:

Goal: Karen will be able to use the calendar.

1. When given a calendar, Karen will be able to fill out at least five dates per month of her social, personal and school related activities with 100% accuracy.

2. When using Karen's personal calendar, Karen will be able to state future dates for upcoming events with 75% accuracy 2/3 trials.

1. Purchase calendar at local store.

    a) Communicate with clerk in store.
    b) Use money skills to purchase calendar.
    c) Identify parts of store.
    d) Practice safety rules when crossing street, etc.
    e) Estimating if Karen has enough money to purchase calendar.

2. Filling in events on calendar.

    a) Use telephone book to contact individuals.
    b) Communicating on telephone
    c) Writing down information (messages)
    d) Neatness
    e) Transfer information from one calendar to another (community/school calendar)

3. Able to know when events occur

    ▪ Be able to talk with peers about upcoming happenings.
    ▪ Scheduling.

- Understanding time passage.
- Purchase cards/stationary to send for events.
- Write addresses on envelope.
- Purchase stamps at Post Office.
- Mail letter.

One can see that the cycle of teaching one skills will repeat constantly. After purchasing the card and stamps, all the above skills will be able to be reinforced as it naturally occurs in everyday life.

If this skill was taught in the "traditional" manner, a:
- Teacher would bring a calendar to school.
- Teacher decides dates on calendar, regardless of student interests.
- Student writes in dates and places calendar "out of sight".

How would you rather be taught!!

Traditional VS Community-Based Instruction

It doesn't take a rocket scientist, but a caring teacher to determine which is the best method.

Domestic

	TRADITIONAL	COMMUNITY-BASED INSTRUCTION
Make a bed	Do it in your classroom or	Go to the motel or home
Sort laundry	Bring in clothes to your room or	Go to the Laundromat
Raking leaves	Rake the school lawn or	Volunteer to rake the lawn of an elderly person in the community. Maybe even start a business

COMMUNITY

Reading a menu	Bring menus to your classroom or	Go to the café and actually order dinner.
Reading safety signs	Flashcards in your classroom or	Go find them uptown.
Buying groceries	You and every other teacher in school brings in empty grocery items or	Go to the store.

VOCATIONAL

Wiping tables	Clean classroom desks and tables or	Go to the local café and clean tables/mall food court.
Hanging up clothes	Bring clothes and hangers to your room or	Go to the student's home and hang up clothes/second hand store, etc.
Following 2-4 step directions	Go to chalkboard. Write the letter L and turn off the light and turn around 3 times or	Go to the Post Office, buy 2 stamps and put on letters and mail.

APPENDIX

JOB DEVELOPMENT TIPS

WHAT'S IN AND WHAT'S OUT FOR JOB DEVELOPERS

New trends in marketing and job development have changed the way Supported Employment (SE) professionals work with employers. As SE incorporates total quality management and principles of customer service, job development techniques must evolve as well.

Job placement agencies must remember that business and job seekers are their customers. And you are in the business of satisfying services.

The following list of what's in and what's out summarizes some of these key changes:

WHAT'S IN	WHAT'S OUT
Value added service	**Hiring incentives**
Community partnership	**Agency self-interest**
Awareness	**Sensitivity**
Identity	**Image**
Hiring to meet human resource needs	**Placement of people with disabilities**
Informed Choice	**Paternalism**
Skillful management of diversity makes good business sense	**Hiring people with disabilities makes good business sense**
Customer service perspective	**Human service perspective**
Customers	**Clients/Consumers/Employers**

A good customer service orientation means that job placement professionals can't afford to wait for customers to seek them out. Instead, they must launch themselves into the business market because their services are valuable.

By building long-term relationships with employers and representing the capabilities of a diverse workforce, SE can benefit both businesses and job seekers with disabilities.

(Rich Luecking - Executive Director, Trans Cen, Inc.)

Job Coaching Tips

Job coaching is an individualized service designed to provide any training that may be necessary for the employee to succeed on the job. It includes but is not limited to:

Developing a task analysis based on observation of the job to learn the duties and demands of that position.

Providing the initial and ongoing training that enables a worker to gain the skills necessary to perform her/his job.

Working on a one-to-one basis, training the employee to perform the job duties, understand the work place culture, and adapt to new and changing routines.

Helping the employee to meet all production and quality standards.

Working closely with the employee, employer, and co-workers to identify the need for job site accommodations.

Working with the employer, co-workers, family and friends to identify a natural support system for the employee.

Working closely with other service systems providing support for the individual to ensure a coordinated effort.

The U.S. Departments of Labor and Education issued new guidelines in September 1992, which apply to students with disabilities in non-employment relationships. A non-employment relationship occurs as part of the vocational exploration, assessment, and training components of CBVE programs. This section presents many of the questions frequently asked about these new guidelines. Each question includes an answer developed by the U.S. Department of Education in collaboration with officials from the U.S. Department of Labor's Wage and Hour Division.

**Requirements
for
Participation**

1. Which students may participate in community-based vocational education under these guidelines for non-employment relationships?

   Students who meet state guidelines for special education may participate in community-based vocational education if it is determined appropriate for them.

2. How is it determined which students might need community-based vocational education?

   The determination should be based on the individual student's needs taking into account the student's preferences and interests. Community-based vocational education would be considered a major change in placement for most students and would require a change in the IEP. The education agency must invite the student to any meetings considering transition services or participation in community-based vocational training.

3. Does the term "physical and mental disabilities" mean that students with learning disabilities are excluded?

   No. Learning disabilities can have their origin in physical or mental disabilities. However, participation in community-based vocational education should not be determined by disability group but rather by individual needs and preferences.

4. The criteria in the guidelines indicate that community-based vocational education is for individuals for whom employment is "not immediately obtainable." What does

this mean?

The "not immediately obtainable" language was placed in the criteria to ensure that students would not be placed in the exploration, assessment, or training components of community-based vocational education if they were capable of obtaining employment at or above the minimum wage level. Community-based vocational programs are organized educational activities intended to prepare students for paid employment while they are in school.

5. The criteria in the guidelines also indicate that community-based vocational education is intended for students who will need "intensive on-going support" to perform in a work setting. Does this mean that it is intended for students with more severe disabilities?

Community-based vocational education is intended for those students with more severe disabilities. However, the level of severity must be based on skills and behaviors necessary to function in a work setting. Examples of ongoing support services include job redesign, environmental adaptations, personal assistance services, transportation, and social skills training (Rehabilitation Act Amendments of 1992, Senate Report 102-357, p. 24).

6. What vocational options should be available to students whose needs wouldn't be considered severe?

Community-based vocational education is not intended to replace vocational education, workstudy, or other vocational training and employment programs. It is intended to be an option made available to students to expand the capacity of education agencies to assist each student to achieve employment objectives.

7. Can these guidelines apply to adults with disabilities who are utilizing vocational rehabilitation services?

The Departments of Education and Labor intended for these guidelines to be used only for youth with disabilities as defined by the Individuals with Disabilities Education Act. However, the U.S. Department of Labor and the National Rehabilitation Facilities Coalition have reached a similar agreement, which would apply, to adults with disabilities.

Documentation Issues

8. What type of documentation needed?

It is important in community-based vocational education programs to document that all participants - the student, the parent or guardian, the employer, and instructional staff - understand that:

1) If at any point the community-based vocational activity is no longer a learning experience, it can not be considered a non-employment relationship;

2) The community-based vocational program must meet all the requirements outlined in the guidelines for non-employment relationships; and

3) Students are not entitled to employment at the worksite where they are receiving instruction and training.

Three types of documentation must be employed to meet the requirements of these guidelines: 1) an IEP reflecting vocational instruction and training goals and objectives relevant to the community-based vocational experience; 2) a letter of agreement outlining the DOL/ED requirements listed above and signed by all participants; and 3) ongoing case notes (i.e. attendance records, progress reports).

9. Does the IEP eliminate the need to adhere to other laws governing child labor?

Technically, child labor laws do not apply where there is not an employment relationship. However, it is highly recommended that educators adhere to child labor laws with regard to hazardous working conditions. Instruction and training in occupations which involve the use of machinery such as deli slicing machines, trash compactors, and bread dough kneading machines have been known to cause serious injury. Child labor laws provide guidance, which can assist education personnel in determining whether a job is hazardous.

10. Do these guidelines from the U.S. Department of Labor supersede individual State Departments of Labor regulations?

No. It is important that community-based vocational education programs comply with both U.S. Department of Labor regulations and State Department of Labor regulations. Where the two do not agree, the regulations with the most stringent requirements for protecting individuals in work settings must apply.

11. Is special or extra liability coverage for students required?

Community-based vocational education is considered part of the student's individualized education program. In non-employment relationships, the worksite is perceived as an extension of the school. In other words, the student is pursuing instructional objectives in a work setting. Since these students are not employees, they are not eligible for the usual workman's compensation or insurance coverage provided to employees. If the student is a paid employee of the business, then the employer is responsible for offering him or her the same liability coverage offered to other employees. If the student's participation in workplace activity can be considered instructional and part of a non-employment relationship, then the school may be responsible for liability coverage. Generally, the same insurance and liability policies which apply to other off-site school experiences (i.e. athletic events, field trips) should apply. Each school district must work out their own policies regarding liability.

12. Do reports have to be made to the U.S. Department of Labor or the U.S. Department of Education?

No. It is not necessary to make reports to the U.S. Department of Labor or the U.S. Department of Education. However, adequate records documenting your programs' compliance with the criteria for non-employment relationships must be maintained. In the event of a Department of Labor investigation of your program, this information must be made available to the Department of Labor.

13. Can we share information from the community-based vocational program with vocational rehabilitation agencies?

Yes. Information from the CBVE program can be shared with other agencies as long as confidentiality procedures are followed.

14. How should issues regarding confidentiality be addressed?

CBVE programs should follow those procedures typically followed with regard to confidential information. These procedures are outlined in section 300.560-300.576 of the IDEA regulations and are incorporated into both state and local policies and procedures.

Program Supervision

15. What is meant by the term "under the general supervision" of public school personnel?

What this means is that the public school or education agency has primary responsibility for the community-based education program. Under IDEA, failure to deliver free appropriate educational services constitutes a violation of the rights of students with disabilities. This phrase places responsibility for ensuring that CBVE programs meet this mandate squarely on the shoulders of public school personnel. While different agencies or groups may deliver these educational services, public school personnel must act as the central agency overseeing the program.

16. How might educators document meeting the general supervision criteria?

Educators can document the general supervision criteria by developing the student's IEP. If a third party, such as a community-based rehabilitation program, is being utilized to carry out the provisions of the IEP, it should be so noted. The education agency must ensure that these guidelines are fully understood and will be followed by the provider.

17. What are the implications of the "continued and direct supervision" requirement for educators and employers?

Student participation in CBVE programs is considered as a valid part of a student's instructional program. As such, he or she is expected to be closely supervised by school staff or employees of the business. Direct supervision can include: 1) one-to-one instruction, 2) small group instruction, 3) supervision in close proximity, and 4) supervision in frequent, regular intervals. Supervision in frequent, regular intervals is permitted when the goal is to assess ability to work independently or to demonstrate mastery of the vocational skill.

18. Is it necessary for someone to monitor the student at all times?

Students in CBVE programs are to be monitored at all times. However, exactly how closely a student needs to be monitored in a community-based work setting must be determined on an individual basis. The various components of CBVE could require a variety of monitoring strategies depending on the goals and objectives outlined in the IEP. For example, vocational exploration and vocational assessment may require closer monitoring than the training component when the student may be working towards more independence in job performance.

19. What educational qualifications and/or certificate must education staff have in order to provide supervision in CBVE programs as the education agency's representative?

It is the responsibility of state and local education agencies to determine the qualifications necessary for education staff providing supervision in CBVE programs.

Instructional Programming

20. Would vocational assessment be required to determine a student's interests and preferences?

A formal vocational assessment may not be required to ascertain a student's preferences and interests if other alternatives are appropriate. However, as part of the overall decision making process, needs for support services or assistive technology should also be identified. These needs may be determined through ongoing assessment procedures inherent in the various components of community-based vocational education.

21. Is it necessary that the program follow sequential order (i.e. exploration, assessment, training)?

No. It is not necessary that the CBVE program follow a prescribed order. Given the nature of the student's needs, any of the three components may be deleted. It is only necessary that the CBVE program follow logical, generally agreed upon instructional best practices. For example, assessment and exploration usually would not follow training in one job classification.

22. Is it necessary that the vocational goals and objectives in the IEP specify exact site placements?

No. It is possible for the IEP to identify only general goals and objectives to be pursued (i.e., job clusters to explore or conduct assessments in; assessments of general work behavior skills; training in a specific occupation). The IEP should, however, expressly limit the amount of time students will spend at any one site or in any one distinguishable job classification. Additional written agreements with parents, students, and employers should reflect the exact location and document the specific nature of the education and training involved.

23. Does the IEP team have to reconvene for multiple vocational explorations, assessments, and training?

No. It is not generally necessary to reconvene the IEP team for multiple vocational explorations, assessments, and training. The vocational IEP objectives and goals can be written broadly enough to incorporate these experiences.

24. What is meant by the phrases "clearly distinguishable occupation" and "clearly distinguishable job classification"?

The word "occupation" refers to a specific profession or vocation generally engaged in as a source of livelihood. Occupation and job classification are meant to be synonymous. Examples of occupations are shipping and receiving clerk, custodian, and painter. Often occupations are confused with specific work activities or work stations that may be integral components of specific occupations. For example, work as a building custodian involves sweeping, emptying trash, and mopping. Each of these work activities must be considered as part of the clearly distinguishable occupation of custodian. If a student has received all allowable hours of non-paid CBVE in the job of school custodian, she should not be moved to a new site for a separate experience as a non-paid office building custodian.

25. Given these guidelines, could an employer move students around to different workstations or occupational areas not specified in their written agreement?

No. As stated earlier, goals and objectives for the student have been outlined in the IEP and written agreements

between the student, parent, employer, and school personnel detail specific activities for the community vocational experience. Thus, the community-based vocational experience can be considered a valid educational experience under the supervision of school personnel. Employers must feel free to remove students from any work activity if they determine that removal is necessary for safety or other reasons. However, under no circumstances should the student be placed in a work station or occupational area not specifically outlined in the written agreement.

26. How will students receive academic credits for community-based education?

How students receive academic credit for work done in CBVE programs is left to the discretion of state and local education agencies. Many education agencies allow course credit for these community experiences since they are the means by which students achieve vocational goals and objectives identified in their IEPs. Frequently, the policy for academic credit in CBVE programs will be consistent with the one used for vocational education programs available to the general population.

27. Do these guidelines refer to programs under special education and/or vocational education?

It does not matter whether the CBVE program is offered through special education or vocational education. However, students participating in CBVE programs under these guidelines for non-employment relationships must be youth with disabilities as defined by the Individuals with Disabilities Education Act.

28. Do these guidelines apply to work during the summer?

Yes. These guidelines may apply to summer CBVE programs as long as they are under the general supervision of school personnel. Many students have individualized instructional programs that call for an extended-year educational program. Other students may simply elect to enroll in summer school.

The Educational Relationship vs. the Employment Relationship

29. What is the difference between an educational relationship and an employment relationship?

In an employment relationship, the student is actually providing services that are of immediate benefit to the employer. The student may be completing assignments normally completed by regular employees. As a result of these activities, vacant paid positions in the business may remain unfilled and regular employees may be displaced or relieved of their normally assigned duties. In an educational relationship, the student engages in work activities as part of an organized educational activity designed to benefit the student. The guidelines on implementing CBVE programs consistent with the FLSA outline the criteria for making the distinction between an employment relationship and a valid educational experience. If it is determined that a student's involvement in community-based vocational education constitutes an employment relationship rather than part of an organized educational activity, then the participating business or school can be held responsible for full compliance with the FLSA regulations. This would include compliance with the FLSA's minimum wage and overtime pay provisions.

30. What is the distinction between benefit to student vs. benefit to employer?

A number of distinctions have been made between benefit to the employer and benefit to the student with regard to CBVE programs (Pumpian, Lewis, & Engel, 1986). Benefit to the employer occurs when the employer recognizes an immediate advantage by having the CBVE student working on the premises. An immediate advantage can be described in terms of increased profitability or production for the business. Benefit to the student occurs when the CBVE program can be considered a valid educational experience for the student. The courts and experts in the field suggest that for CBVE to represent an educationally valid experience the following instructional practices should be implemented:

1) Students receive adequate orientation and instruction before performing new tasks.

2) The student's goals and objectives to be met in the community-based education program are clearly defined.

3) Activities in the community-based setting relate directly to student goals and objectives.

4) The student's activities in the CBVE program are closely monitored.

5) Records of the student's progress are maintained.

6) The necessary support and time for students to develop proficiency at new tasks are provided.

31. What is the educator's role in assuring that regular employees will not be displaced by the student trainee in the workplace?

The community experience must be primarily for the benefit of the student. Also, regular employees must not be displaced or relieved of assigned duties and vacant positions should not go unfilled. Two strategies are available to educators for ensuring that this criterion is met. First, the educator can confirm that all parties - the employer, the student, and the parents - understand that students in the CBVE program must not displace regular employees. An agreement documenting this understanding should be signed by all involved. Secondly, those who provide direct supervision to the student at the worksite may observe when employee displacement and other violations are occurring and take steps to correct the situation.

32. If the activity is ordinarily not performed by employees and yet is beneficial to the business, can the student perform the activity?

The student should either not perform the activity or be paid appropriate wages. Although regular employees have not been displaced or relieved of assigned duties, the student is still providing services which are of benefit to the business. Therefore, an employment relationship exists between the student and the employer. This would not be the case if the activity were of no benefit to the employer and consisted of "busy-work" designed to develop or

improve a student's skills. For example, reorganizing materials awaiting shipment into sets of five would not constitute an employment relationship if the business did not ship the materials in this manner.

33. Can students accept an offer of paid employment at a worksite where they were placed for community-based education?

    Yes. Students may accept an offer of paid employment at a worksite where they received instruction and training. The student would then become an employee of the business and an employment relationship would ensue. This means that the employer is responsible for full compliance with the FLSA, including minimum wage and overtime pay provisions.

34. Could the student be paid less than the minimum wage?

    Yes. Employment below the minimum wage rate is permitted in instances when a worker's disabilities impair their ability to perform the job. This special minimum wage rate is based on the productivity of the worker with disabilities as compared to the productivity of a worker without disabilities. Employees must apply to the U.S. Department of Labor for authority to employ workers with disabilities at these special minimum wage rates.

Tips for Effective Transition Planning
1.) **Start the process early.**
2.) **Utilize the strengths and interests of the student**
3.) **Community-Based Instruction**
4.) **Utilize the resources of the school.**
5.) **Plan for transportation needs.**
6.) **Involve the student**
7.) **Follow a sequential, documented process.**
8.) **Develop relationships first, ask for services later.**
9.) **Be creative.**
10.) **Have high expectation.**